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7 *Attorneys for Defendant*
8 *Freeman Expositions, LLC*
Improperly Named The Freeman Company, LLC

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

13 JAMES ROUSHKOLB,

14 Plaintiff,

15 vs.

16 THE FREEMAN COMPANY, LLC, a
17 Domestic Corporation;
18 EMPLOYEE(S)/AGENT(S) DOES I-X; and
19 ROE CORPORATIONS XI-XX, Inclusive,
20 Defendants.

Case No. 2:19-cv-02084-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANT'S RESPONSE TO
PLAINTIFF'S COMPLAINT
(First Request)**

21 IT IS HEREBY STIPULATED by and between Plaintiff, James Roushkolb ("Plaintiff"),
22 through his counsel The Gabroy Law Offices, and Defendant Freeman Expositions, LLC improperly
23 named as The Freeman Company, LLC ("Defendant"), through its counsel Jackson Lewis P.C., that
24 Defendant shall have up to and including **Tuesday, January 7, 2020**, in which to respond to
25 Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

- 26 1. That Defendant's answer or response in the Eighth Judicial District Court was due
27 on December 5, 2019.
- 28 2. That Defendant filed its Petition for Removal on December 5, 2019. ECF No. 1.

1 3. That this is the first request for an extension of time for Defendant to respond to
2 Plaintiff's Complaint.

3 4. That such an extension is necessary because defense counsel requires additional
4 time to investigate facts that will allow for an informed response to the pending Complaint.

5 5. That this request is made in good faith and not for the purpose of delay.

6 6. That nothing in this Stipulation, nor the fact of entering to the same, shall be
7 construed as waiving any claim and/or defense held by any party.

8 Dated this 9th day of December, 2019.

9 GABROY LAW OFFICES

JACKSON LEWIS P.C.

10
11 /s/ Christian Gabroy
12 Christian Gabroy
13 Nevada State Bar No. 8805
14 GABROY LAW OFFICES
15 The District at Green Valley Ranch
16 170 South Green Valley Parkway, Suite 280
17 Henderson, Nevada 89012

18 *Attorneys for Plaintiff*

19 /s/ Lynne K. McChrystal
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25 Las Vegas, Nevada 89101

26 *Attorneys for Defendant*

27 **ORDER**

28 IT IS SO ORDERED:

29 _____
30 United States Magistrate Judge

31 Dated: December 10, 2019

32 4833-7273-2334, v. 1